

Civil Penalty Appeals & Referrals Lobbyist/Employer of LOB

Presented by:
Heather Dalberg
Paralegal I

[05]

<p align="center">CONSENT AGENDA APPEALS UNDER AS 39.50, 2AAC 50.850-2 AAC 50.865</p> <p align="center">Regulation of Lobbying</p>
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June 8, 2016 Commission Meeting

ITEM	APPEALED BY:	STAFF RECOMMENDATION:	PAGE	COMMISSION ACTION:
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[illegible]



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

April 29, 2016

Myron Klein
5454 Shaune Drive
Juneau, AK 99801
myron.klein@wsialaska.com

Re: COMMISSION MEETING NOTICE

Mr. Klein:

At its June 8, 2016 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Employer of Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting in person or by telephone (1-800-315-6338, code 41761#), please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **10:05 a.m. on Wednesday, June 8, 2016**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Respectfully,

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal I

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Myron Klein
5454 Shaune Drive
Juneau, AK 99801
myron.klein@wsialaska.com



Paralegal I

4/29/16

Date



APOC STAFF RECOMMENDATION FOR COMMISSION ACTION

PREPARED BY: Heather Dalberg

DATE: April 29, 2016

RESPONDENT: Wright Services Inc.

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.110

REASON FOR FILING: Employer of Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Employer of Lobbyist Report

REASON FOR FILING: 4th Quarter Employer of Lobbyist Report

DUE DATE: 2/1/16¹

FILED ON: 2/10/16

DAYS LATE: 9

LATE NOTICE(S) SENT: 1

CPA APPEAL RECEIVED: 3/4/16

MAXIMUM STATUTORY CPA: \$90.00

RECOMMENDATION: Waive

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. The lobbyist, Donna Busig, was an employee of Wright Services until November 6, 2015. Ms. Busig had registered as a lobbyist with Wright Services in case any lobbying activity took place within her job duties. Ms. Busig never lobbied on the company's behalf.
2. The affiant, Myron Klein, was not notified of the reporting requirements by Ms. Busig when she left the company.

¹ The regular 4th Quarter due date of January 31 was extended due to it falling on a weekend (2 AAC 50.811 (d)).

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. On January 1, 2016 the electronic filing system generated an automatic email to all the filers expected to submit a 4th Quarter Report. This feature does not notify staff if an email is undeliverable.

On January 29, 2016 staff emailed a reminder to all those who had yet to file. The email address for Wright Services came back as undeliverable.

On February 1, 2016 staff called all those who had yet to file. Wright Services' point of contact (both by email and phone), Donna Busig, was no longer employed with the company at the time of the phone call. The employee who answered staff's call informed staff that Ms. Busig no longer worked for Wright Services and recommended staff contact Kimberly Klein about the reporting requirement. Ms. Klein replied to the email and instructed staff contact Myron Klein, the owner of the business. Staff emailed Mr. Klein and receive a response that day.

On February 2, 2016 staff emailed a delinquent letter to Mr. Klein's email address. Staff did receive a response.

On February 5, 2016 staff contacted to Mr. Klein again to inform him of Wright Services' reporting requirement. Mr. Klein responded that day and asked what he needed to do. Staff emailed a detailed list of instructions for Mr. Klein to follow to complete the report. Mr. Klein responded later that day requesting proof that the company had registered with a lobbyist, as Ms. Busig did not appear to have informed them of her registering. Mr. Klein requested the proof at 5:20 pm, after the APOC office had closed. Staff did not receive the request until Monday, February 8, 2015.

On February 8, 2016 staff emailed Mr. Klein a PDF copy of Ms. Busig's lobbyist registration and an explanation of why they were required to file.

Mr. Klein filed the zero report on February 9, 2016.

APOC staff recommends the commission recognize the late report caused no degree of harm to the public for not having the information.

2. Mr. Klein was unaware of Ms. Busig registering the company as an employer of lobbyist. Ms. Busig was the filer for both herself as a lobbyist and the company as an employer of lobbyist. Mr. Klein did not know of any of the reporting requirements or that his company was registered with a lobbyist.

APOC staff recommends the commission recognize this situation as a unique circumstance.

FILER'S REPORTING HISTORY:

Affiant was not aware of his employee taking this action. The employee filed timely during employment until her departure from the company. The company has been a filer since February of 2015. This is their first Civil Penalty.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends a waiver for no significant harm to the public, inexperienced filer, and a unique circumstance.

Staff considers Wright Services an inexperienced filer due to the company not knowing of their employee's actions and the filing requirements with APOC.

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- ☒ Good filing history (no late filings in the previous 5 years) AND zero report. **2 AAC 50.865(a)(1)(A)**
- ☒ Inexperienced filer.² **2 AAC 50.865(a)(1)(B)**
- ☐ Technical error at APOC. **2 AAC 50.865(a)(2)**
- ☒ Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- ☐ Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- ☐ Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- ☐ APOC Staff error, including confirmed technical problems with electronic filing system. **2 AAC 50.865(b)(2)**
- ☐ Failure of a municipal clerk to provide notice to a municipal official of delinquency, or, failure of a municipal clerk to provide notice to a municipal official that a report does not meet the filing requirements under 2 AAC 50.850(f). **2 AAC 50.865(b)(3)**
- ☐ Report included only administrative costs (Groups only). **2 AAC 50.865(b)(4)**
- ☐ No significant harm to the public³ AND no aggravating factors. **2 AAC 50.865(b)(5)**
- ☒ The maximum civil penalty assessment is significantly greater and out of proportion to the degree of harm to the public for not having the information. **2 AAC 50.865(b)(6)**
- ☒ A unique circumstance. **2 AAC 50.865(b)(7)**

² Any entity or filer subject to a registration or reporting requirement for less than 365 days.

³ The dollar amount missing is \$100 or less; the dollar amount missing is more than \$100 but less than \$1,000 and the filer self reported; or the missing information is readily available to the public through another forum.

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- ☐ Relying on another person or mailroom to mail, or submit the statement timely. **2 AAC 50.865(c)(1)**
- ☐ Forgetting to file. **2 AAC 50.865(c)(2)**
- ☐ Being a volunteer. **2 AAC 50.865(c)(3)**
- ☐ Having no change in data from previous statements on file. **2 AAC 50.865(c)(4)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **2 AAC 50.865(c)(5)**
- ☐ Being too busy to file. **2 AAC 50.865(c)(6)**
- ☐ Staff turnover, unless turnover created turmoil serious enough to justify a finding of unique circumstances. **2 AAC 50.865(c)(7)**
- ☐ Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. **2 AAC 50.865(c)(8)**

Aggravating Factors [2 AAC 50.865(d)]:

- ☐ Failure to comply with disclosure requirements by omitting a significant source of income, interest in real property, business interest, loan, trust, or other substantial financial interest.⁴ **2 AAC 50.865(d)(1)**
- ☐ More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- ☐ Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- ☐ Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- ☒ **Waived**
- ☐ **Reduced**
- ☐ **Upheld at the assessed amount of _____**

⁴ Value greater than \$1000.



February 10, 2016

Wright Services
ATTN: Myron Klein
5454 Shaune Drive
Juneau, AK 99801

RE: Notice of Penalty Assessment

Dear Mr. Klein:

According to our records you did not file your 2015 4th Quarter Employer of Lobbyist Report that was due on 2/1/15. Instead your report was filed on 2/10/16 (9 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$90.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; or, you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff's conclusion that a violation has occurred or the penalty amount assessed.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission to consider concerning the violation and the penalty amount. You will receive a copy of that recommendation and a notification of when the Commission will meet to consider the matter. When the Commission reviews the appeal and recommendation you will have the opportunity to participate in the meeting either in person or telephonically.

Failure to respond to this notice by either making arrangements for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the maximum penalty.

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter please contact APOC staff.


ALASKA PUBLIC OFFICES COMMISSION

Heather Dalberg
Paralegal I
Juneau APOC Office

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

7010 2780 0000 7491 4042

U.S. Postal Service TM	
CERTIFIED MAILTM RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To <u>Wright Services</u> <u>4th str 1st letter</u>	
Street, Apt. No., or PO Box No. <u>5454 Shaune Drive</u>	
City, State, ZIP+4 <u>Juneau, AK 99801</u>	
PS Form 3800, August 2006 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>Jeremy Colambo</u> C. Date of Delivery <u>2-12</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p><u>Wright Services</u> <u>ATTN: Myron Klein</u> <u>5454 Shaune Drive</u> <u>Juneau, AK 99801</u></p> <p></p> <p>9590 9403 0606 5183 5553 59</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered MailTM</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature ConfirmationTM</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Restricted Delivery</p>
<p>2. Article Number (Transfer from service label)</p> <p>7010 2780 0000 7491 4042</p>	

PS Form 3811, April 2015 PSN 7530-02-000-9053

Domestic Return Receipt

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer):

Wright Services, Inc.

Employer (if a lobbyist):

Penalty issued in connection with (check box or boxes):

☐

Lobbyist Report for _____ (month or quarter)

☒

Employer of Lobbyist Report for fourth (quarter)

Specify Year: 2015

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of AS 24.45, the Alaska Lobbying Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

Please see attached statement.

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date:

Myron W. Klein

3/2/16

Type/Print Signer's Name:

Myron W. Klein

Reasons for not assessing Civil Penalty under AS 24.45:

The Employer of Lobbyist Report was being filed by Donna Busig, an employee of Wright Services, Inc., apparently to cover any circumstance where lobbying activity might take place. No lobbying activity was ever conducted by Donna on the Company's behalf and upon her termination of employment on November 6, 2015 no files or records were left by her with the Company indicating there was an on-going requirement to make the Employer of Lobbyist Report.

MAR -4 11

Dalberg, Heather L (DOA)

From: Kimberly Klein <kimberly.klein@wsialaska.com>
Sent: Monday, February 01, 2016 4:14 PM
To: Dalberg, Heather L (DOA)
Cc: Myron Klein
Subject: RE: 4th Quarter Employer of Lobbyist Report

Heather,

Donna Busig is no longer employed with Wright Services Inc. I am going to be out of town for the rest of week.

Please contact Myron.klein@wsialaska.com as he's the owner of the business.

Thank you,
Kimberly Klein

From: Dalberg, Heather L (DOA) [mailto:heather.dalberg@alaska.gov]
Sent: Monday, February 01, 2016 3:20 PM
To: kimberly.klein@wsialaska.com
Subject: 4th Quarter Employer of Lobbyist Report

Hello Kimberly,

I was asked to email you in regard to an issue we are having with Donna Busig. She registered as a lobbyist for Wright Services back in February and has become unreachable since November. Wright Services is responsible for submitting a 4th Quarter Employer of Lobbyist Report by midnight tonight. Donna is, as well, responsible for submitting a lobbyist report. She used to submit the employer reports and her lobbyist reports, but since she is no longer answering calls or emails, I wanted to touch base with someone there.

The 4th Quarter Report needs to be submitted by midnight tonight and for every day that it is late, there is a \$10 penalty. Please contact me and I will explain the filing process and can help you submit it so there aren't any fees.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Dalberg, Heather L (DOA)

From: Dalberg, Heather L (DOA)
Sent: Monday, February 01, 2016 4:15 PM
To: Myron.klein@wsialaska.com
Subject: 4th Quarter Employer of Lobbyist Report Issue

Importance: High

Hello Myron,

I was asked by Kimberly Klein to email you in regard to an issue we are having with Donna Busig. She registered as a lobbyist for Wright Services back in February and has become unreachable since November. Wright Services is responsible for submitting a 4th Quarter Employer of Lobbyist Report by midnight tonight. Donna is, as well, responsible for submitting a lobbyist report. She used to submit the employer reports and her lobbyist reports, but since she is no longer answering calls or emails, I wanted to touch base with someone there. The report needs to be submitted even though she is no longer with the company. Since she did not end the contract within our system, there is an expectation for the report to be submitted.

The 4th Quarter Report needs to be submitted by midnight tonight and for every day that it is late, there is a \$10 penalty. Please contact me and I will explain the filing process and can help you submit it so there aren't any fees.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Dalberg, Heather L (DOA)

From: Dalberg, Heather L (DOA)
Sent: Tuesday, February 02, 2016 9:30 AM
Subject: Delinquent Report

Importance: High

Dear Filer:

According to our records, you did not file your 4th Quarter Lobbying Report due on February 1, 2016. Failure to file a timely report results in the assessment of civil penalties for failure to comply with the provisions of the lobbying law under AS 24.45. By law, a penalty of \$10.00 per day accrues for every day the report is not filed. **As of the date of this letter, the report is 1 day late and the accrued penalty is \$10.**

Please submit the delinquent report along with your check for the accrued penalty. Your payment should include the entire accrued penalty due through the date of payment. As stated above, the \$10.00 per day penalty continues to accrue until you file the report. **To stop the accrual of penalties please file your report immediately.** If you have questions regarding what is the final total, please call our office.

In the alternative, you have a right to appeal the assessment of this penalty. **If you wish to contest the assessment of penalty, you must submit the enclosed appeals affidavit to the Commission within thirty (30) days of the date of this letter. Discussions with Commission staff regarding a payment agreement do not toll the appeal period.** The APOC staff will review your affidavit and if the penalty is less than \$100.00 staff may affirm, reduce, or waive the penalty. If the penalty is more than \$100.00 but less than \$250.00, APOC staff may reduce the penalty by 50 percent. For any penalty greater than \$250.00, APOC staff will review your affidavit and make a recommendation to the Commission regarding whether the penalty should be affirmed, reduced or waived. The staff will notify you of its recommendation before the Commission meeting at which your appeal is considered. The Commission will review your affidavit and consider your appeal during the Commission meeting, which you may participate in telephonically or in person. The Mitigation Criteria used by the Commission can be found on the APOC website at <http://doa.alaska.gov/apoc/>. Further information on your right to appeal the assessment of penalty can be found in 2 AAC 50.855; 2 AAC 50.860; and 2 AAC 50.865.

Failure to respond to this notice by making payment arrangements or by appealing the assessment will result in the staff presenting this matter to the Commission for entry of a final order assessing the penalty due.

Finally, should you have any questions or need assistance, please contact this office at 907-465-4864. If you are calling long distance to Juneau from within the state, you may call toll-free at 866-465-4864.

Sincerely,
ALASKA PUBLIC OFFICES COMMISSION

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Dalberg, Heather L (DOA)

From: Dalberg, Heather L (DOA)
Sent: Friday, February 05, 2016 8:56 AM
To: Myron.klein@wsialaska.com
Subject: Late Report

Hi Myron,

I am trying to reach someone from Wright Services who can file the final report for their 2015 employer of lobbyist expectation. Donna Busig was hired as a lobbyist by your company and I am aware that she is no longer at the company. However, she did not terminate her contract so both her and Wright Services must file a final report.

I understand that you may not be the person in charge of these reports, but this is the email address I have been given as I have tried to contact someone at your company to take care of this matter. If you would either email me back or call me, I would be happy to assist you in filing the final report.

There is a \$10 a day penalty for every day that this report is late. It is currently 4 days late and has accrued \$40.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Mr. Klein,

Thank you for getting in touch with me.

In order for me to give you access to Wright Service's Insight account, I will need you to set up a myAlaska account. You can do that at this [link](#).

If you already have a myAlaska account that you would like to use, go ahead and login and go through the following steps:

1. Your page should have tabs at the top that read "My Profile" and "Services" etc.
2. Click on "Services"
3. A series of links will appear. Click on "APOC Disclosure Forms"
4. You will then see tabs at the top and click on the one that says "Lobbying"
5. Once you click "Lobbying", let me know your username and I can then link it to the account

Once you have access to the account, you will go to "Employer of Lobbyist Reports" where you will see the previous reports that Donna filed. You will click the red button that says "Start New Form" where you will go through the pages and enter the appropriate information. On page two, you will change the "Report Year" from 2016 to 2015 and will be able to select "4th Quarter Report". I imagine that this will be a zero report, so all you really need to do is go through each page and click the "Zero Report" tabs as they come up.

On the final page, it will say "Incomplete". Scroll to the bottom of that page and click "Sign & Submit" where you will be prompted to enter your password. Once this is done, your form should be submitted.

I appreciate your cooperation in this matter.

Thank you,

Heather L. Dalberg

Paralegal I

Alaska Public Offices Commission

907.465.4864

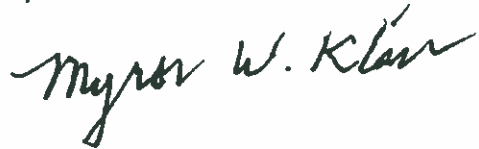
Fax: 907.465.4832

Heather L. Dalberg
Alaska Public Offices Commission
Heather.dalberg@alaska.gov

Heather,

Please provide proof that we are responsible for filing this report. We have no record authorizing any lobbying activity. Furthermore your reporting site does not work. Some of the tab buttons are non-responsive and if fact with some manipulation provide me with the computer code used to set the Form up. I have no interest in modifying or hacking the code to make the screen prompts work or to screw up your system more than it already is. See my comments on the following page. Please send a Form by fax that I can sign disavowing any on-going lobbying contract with Donna or any other purported lobbyist.

Myron W. Klein

A handwritten signature in black ink that reads "Myron W. Klein". The signature is written in a cursive, flowing style.

Subject: Account Set-Up

From: "Dalberg, Heather L (DOA)" <heather.dalberg@alaska.gov>

Date: 2/5/2016 10:58 AM

To: "Myron.klein@wsialaska.com" <Myron.klein@wsialaska.com>

Mr. Klein,

Thank you for getting in touch with me.

In order for me to give you access to Wright Service's Insight account, I will need you to set up a myAlaska account. You can do that at this [link](#).

If you already have a myAlaska account that you would like to use, go ahead and login and go through the following steps:

1. Your page should have tabs at the top that read "My Profile" and "Services" etc.
2. Click on "Services"
3. A series of links will appear. Click on "APOC Disclosure Forms"
4. You will then see tabs at the top and click on the one that says "Lobbying"
5. Once you click "Lobbying", let me know your username and I can then link it to the account

Once you have access to the account, you will go to "Employer of Lobbyist Reports" where you will see the previous reports that Donna filed. You will click the red button that says "Start New Form" where you will go through the pages and enter the appropriate information. On page two, you will change the "Report Year" from 2016 to 2015 and will be able to select "4th Quarter Report" I imagine that this will be a zero report, so all you really need to do is go through each page and click the "Zero Report" tabs as they come up. *done*

On the final page, it will say "Incomplete". Scroll to the bottom of that page and click "Sign & Submit" where you will be prompted to enter your password. Once this is done, your form should be submitted. *done*

I appreciate your cooperation in this matter

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Nothing was on the screen.

the "Reporting As" button does not work and the "Next" button does not work. No "Zero Report" tabs came up. Could not get to final page.

- Myron

From Dalberg, Heather L (DOA) **Date** Monday, February 08, 2016 8:55:00 AM
To Myron
Cc
Subject RE: Report pages are non-operative

Hi Myron,

The reason the filing did not work is because you missed the 5th step I provided. You need to let me know your username so I can link it to the Wright Services account. Without doing this, you are not filing for Wright Services. That is why you could not see Ms. Busig's lobbying activity. Please provide me with the username you were using and I will add you as a user on the existing account. Once you do this, you will be able to see the filings for 2015. Please call me if you have any more questions.


Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

-----Original Message-----

From: Myron [<mailto:myron.klein@wsialaska.com>]
Sent: Friday, February 05, 2016 5:20 PM
To: Dalberg, Heather L (DOA)
Subject: Report pages are non-operative

This E-mail was sent from "RNP0026737CF2CF" (MP C4503).

Scan Date: 02.05.2016 17:19:44 (-0900)
Queries to: scsalaska@wsialaska.com

From Dalberg, Heather L (DOA) **Date** Monday, February 08, 2016 9:19:00 AM
To Myron
Cc
Subject RE: Report pages are non-operative
 [Wright Services - Donna Busig Lobbyist Registration 2015.pdf](#) (57 KB [HTML](#))

Myron,

Please find attached a copy of Donna Busig's lobbyist registration. She registered in February of 2015. According to her registration, she registered as a precaution and was not actually engaging in lobbying activity. Employees keep track of any lobbying activity and must register if they go over 10 hours in any 30 day period. She may have not wanted to count her hours and decided to register as a lobbyist with your company to avoid doing so. All of her previous reports and Wright Services' previous reports have been zero reports. This 4th quarter report will also be a zero report, most likely.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

-----Original Message-----

From: Myron [<mailto:myron.klein@wsialaska.com>]
Sent: Friday, February 05, 2016 5:20 PM
To: Dalberg, Heather L (DOA)
Subject: Report pages are non-operative

This E-mail was sent from "RNP0026737CF2CF" (MP C4503).

Scan Date: 02.05.2016 17:19:44 (-0900)
Queries to: scsalaska@wsialaska.com

LOBBYIST REGISTRATION FORM

COMPLETED

Lobbyist Signature Date **02/11/2015**
Employer Signature Date **02/11/2015**
Registration Year **2015**
Lobbying Start Date **02/11/2015**

Filer First Name: **Donna**
Filer Middle Name: **Jean**
Filer Last Name: **Busig**

LOBBYIST INFORMATION

First Name: **Donna**
Middle Name: **Jean**
Last Name: **Busig**

Business Name:

Voter Registration District: **7D - Greater Wasilla**

Permanent Mailing Address: **151 North Ashlee Circle**
City, State Zip: **Wasilla, Alaska 99654**
Phone: **907-230-1692**
E-mail: **donna.busig@wsialaska.com**
Fax:

Legislative Mailing Address: **151 North Ashlee Circle**
City, State Zip: **Wasilla, Alaska 99654**
Phone: **907-230-1692**
E-mail: **donna.busig@wsialaska.com**
Fax:

Spouse/Domestic Partner of Legislative Employee or Public Official? **No**

EMPLOYEE / CLIENT INFORMATION

Employer: **Wright Services Inc**
Contact Person First Name: **Myron**
Contact Person Middle Name: **Wright**
Contact Person Last Name: **Klein**
Address: **5454 Shaune Drive**
City, State Zip: **Juneau, Alaska 99801**
Phone: **906-780-5454**
E-mail: **donna.busig@wrightservicesinc.com**
Fax: **907-780-5459**

COMPENSATION

Will you perform other services in addition to lobbying for the employer or client named on this registration?
Yes

General Manager of company

Will you engage in Administrative Lobbying on behalf of the client/employer?
Yes

Will you engage in Legislative Lobbying on behalf of the client/employer?
Yes

What is the nature of your compensation? **Salaried Employee: Hourly Wage**
Amount: **\$68.50**

Will you be Reimbursed for Expenses?

Yes

Will you receive other compensation?

No

LOBBYING INTERESTS

Alaska landlord tenant laws

QUALIFICATION OR WAIVER

I have not yet engaged in lobbying activities for 10 hours in a 30-day period. I understand that I am not required to register as a lobbyist at this time but choose to do so. I understand that by registering as a lobbyist, I am prohibited from

Serving as a campaign manager or director; serving as a campaign treasurer or deputy treasurer; hosting a fundraising event; directly or indirectly collecting contributions for, or delivering contributions to, a candidate; or otherwise engaging in the fund-raising activities of a legislative or state-wide campaign for the remainder of this calendar year. AS 24.45.121(a)(8).

Making contributions to legislative candidates for one year after the date of this registration, except for legislative candidates running for the district in which I am eligible to vote. AS 15.13.074(g).

Violating the prohibitions listed in AS 24.45.121.

AFFIRMATION

Pursuant to AS 09.63.010, by signing this document I affirm, under penalty of perjury, that:

I have completed the appropriate training course administered by the Commission within the last 12 months [AS 24.45.041(b)];

I have not been previously convicted of a felony involving moral turpitude [AS 24.45.041(b)];

I am not prohibited from registering as a lobbyist by AS 24.45.121(c), (d), or (e);

Page 2 of 2

From Dalberg, Heather L (DOA) **Date** Wednesday, February 10, 2016 8:40:00 AM
To Myron
Cc
Subject RE: Report pages are non-operative

Thank you, Myron.

I was able to add your username to the existing Wright Services account. Now, if you follow the steps I sent you, you should be able to file this report and see the previous reports Donna filed.

When you file this report, please update the contact information to a mailing address where I can reach you. Let me know if you run into any trouble.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

-----Original Message-----

From: Myron [<mailto:myron.klein@wsialaska.com>]

Sent: Tuesday, February 09, 2016 4:43 PM

To: Dalberg, Heather L (DOA)

Subject: Re: Report pages are non-operative

My username is [REDACTED] Myron

On 2/8/2016 8:56 AM, Dalberg, Heather L (DOA) wrote:

- > Hi Myron,
- > The reason the filing did not work is because you missed the 5th step I provided. You need to let me know your username so I can link it to the Wright Services account. Without doing this, you are not filing for Wright Services. That is why you could not see Ms. Busig's lobbying activity.
- > Please provide me with the username you were using and I will add you as a user on the existing account. Once you do this, you will be able to see the filings for 2015.
- > Please call me if you have any more questions.
- >

EMPLOYER OF LOBBYIST REPORT FORM

COMPLETED

Signed 02/10/2016

Year: 2015

Report: 4th Quarter

Filer First Name: MYRON

Filer Middle Name: W

Filer Last Name: KLEIN

EMPLOYER INFORMATION

Employer Name: Wright Services Inc

Mailing Address: 5454 Shaune Drive

City, State Zip: Juneau, Alaska 99801

Phone: 906-780-5454

E-mail: myron.klein@wsialaska.com

Fax: 907-780-5459

GIFTS

Date	Name	Position	Nature of Gift	Value
No Gifts Given				

NOTICE OF TERMINATION

Lobbyist Name	Termination Date
2015 - Busig, Donna	11/06/2015

INTERESTS OF EMPLOYER

General description of the legislative and administrative action the employer of lobbyist attempted to influence during the period. Report specific bill numbers when possible. AS 24.45.061(a)(5).

N/A

Nature and interest of the entity employing or retaining lobbying services:

N/A

SCHEDULE A (COMPENSATION AND EXPENSES PAID TO OR ON BEHALF OF THE LOBBYIST)

Lobbyist Name	Compensation		Expenses	
2015 - Busig, Donna	No Activity		No Activity	
	Totals		Totals	
	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$0.00	New Total	\$0.00

SCHEDULE B (COSTS RELATED TO LOBBYING)

In-House Costs Related to Lobbying

Employee Name	Lobbying Activity	Support of Lobbying	Amount
No In-House Lobbying Costs			

Outsourced Costs Related to Lobbying

Date	Payee/Vendor	Address	Purpose	Amount
No Outsourced Lobbying Costs				

Costs Related to Lobbying Totals

	This Report	\$0.00
	Previous Total	\$0.00
	New Total	\$0.00

Dalberg, Heather L (DOA)

From: Kimberly Klein <kimberly.klein@wsialaska.com>
Sent: Monday, February 01, 2016 4:14 PM
To: Dalberg, Heather L (DOA)
Cc: Myron Klein
Subject: RE: 4th Quarter Employer of Lobbyist Report

Heather,

Donna Busig is no longer employed with Wright Services Inc. I am going to be out of town for the rest of week.

Please contact Myron.klein@wsialaska.com as he's the owner of the business.

Thank you,
Kimberly Klein

From: Dalberg, Heather L (DOA) [mailto:heather.dalberg@alaska.gov]
Sent: Monday, February 01, 2016 3:20 PM
To: kimberly.klein@wsialaska.com
Subject: 4th Quarter Employer of Lobbyist Report

Hello Kimberly,

I was asked to email you in regard to an issue we are having with Donna Busig. She registered as a lobbyist for Wright Services back in February and has become unreachable since November. Wright Services is responsible for submitting a 4th Quarter Employer of Lobbyist Report by midnight tonight. Donna is, as well, responsible for submitting a lobbyist report. She used to submit the employer reports and her lobbyist reports, but since she is no longer answering calls or emails, I wanted to touch base with someone there.

The 4th Quarter Report needs to be submitted by midnight tonight and for every day that it is late, there is a \$10 penalty. Please contact me and I will explain the filing process and can help you submit it so there aren't any fees.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Dalberg, Heather L (DOA)

From: Dalberg, Heather L (DOA)
Sent: Monday, February 01, 2016 4:15 PM
To: Myron.klein@wsialaska.com
Subject: 4th Quarter Employer of Lobbyist Report Issue

Importance: High

Hello Myron,

I was asked by Kimberly Klein to email you in regard to an issue we are having with Donna Busig. She registered as a lobbyist for Wright Services back in February and has become unreachable since November. Wright Services is responsible for submitting a 4th Quarter Employer of Lobbyist Report by midnight tonight. Donna is, as well, responsible for submitting a lobbyist report. She used to submit the employer reports and her lobbyist reports, but since she is no longer answering calls or emails, I wanted to touch base with someone there. The report needs to be submitted even though she is no longer with the company. Since she did not end the contract within our system, there is an expectation for the report to be submitted.

The 4th Quarter Report needs to be submitted by midnight tonight and for every day that it is late, there is a \$10 penalty. Please contact me and I will explain the filing process and can help you submit it so there aren't any fees.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Dalberg, Heather L (DOA)

From: Dalberg, Heather L (DOA)
Sent: Tuesday, February 02, 2016 9:30 AM
Subject: Delinquent Report

Importance: High

Dear Filer:

According to our records, you did not file your 4th Quarter Lobbying Report due on February 1, 2016. Failure to file a timely report results in the assessment of civil penalties for failure to comply with the provisions of the lobbying law under AS 24.45. By law, a penalty of \$10.00 per day accrues for every day the report is not filed. **As of the date of this letter, the report is 1 day late and the accrued penalty is \$10.**

Please submit the delinquent report along with your check for the accrued penalty. Your payment should include the entire accrued penalty due through the date of payment. As stated above, the \$10.00 per day penalty continues to accrue until you file the report. **To stop the accrual of penalties please file your report immediately.** If you have questions regarding what is the final total, please call our office.

In the alternative, you have a right to appeal the assessment of this penalty. **If you wish to contest the assessment of penalty, you must submit the enclosed appeals affidavit to the Commission within thirty (30) days of the date of this letter. Discussions with Commission staff regarding a payment agreement do not toll the appeal period.** The APOC staff will review your affidavit and if the penalty is less than \$100.00 staff may affirm, reduce, or waive the penalty. If the penalty is more than \$100.00 but less than \$250.00, APOC staff may reduce the penalty by 50 percent. For any penalty greater than \$250.00, APOC staff will review your affidavit and make a recommendation to the Commission regarding whether the penalty should be affirmed, reduced or waived. The staff will notify you of its recommendation before the Commission meeting at which your appeal is considered. The Commission will review your affidavit and consider your appeal during the Commission meeting, which you may participate in telephonically or in person. The Mitigation Criteria used by the Commission can be found on the APOC website at <http://doa.alaska.gov/apoc/>. Further information on your right to appeal the assessment of penalty can be found in 2 AAC 50.855; 2 AAC 50.860; and 2 AAC 50.865.

Failure to respond to this notice by making payment arrangements or by appealing the assessment will result in the staff presenting this matter to the Commission for entry of a final order assessing the penalty due.

Finally, should you have any questions or need assistance, please contact this office at 907-465-4864. If you are calling long distance to Juneau from within the state, you may call toll-free at 866-465-4864.

Sincerely,
ALASKA PUBLIC OFFICES COMMISSION

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Dalberg, Heather L (DOA)

From: Dalberg, Heather L (DOA)
Sent: Friday, February 05, 2016 8:56 AM
To: Myron.klein@wsialaska.com
Subject: Late Report

Hi Myron,

I am trying to reach someone from Wright Services who can file the final report for their 2015 employer of lobbyist expectation. Donna Busig was hired as a lobbyist by your company and I am aware that she is no longer at the company. However, she did not terminate her contract so both her and Wright Services must file a final report.

I understand that you may not be the person in charge of these reports, but this is the email address I have been given as I have tried to contact someone at your company to take care of this matter. If you would either email me back or call me, I would be happy to assist you in filing the final report.

There is a \$10 a day penalty for every day that this report is late. It is currently 4 days late and has accrued \$40.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Mr. Klein,

Thank you for getting in touch with me.

In order for me to give you access to Wright Service's Insight account, I will need you to set up a myAlaska account. You can do that at this [link](#).

If you already have a myAlaska account that you would like to use, go ahead and login and go through the following steps:

1. Your page should have tabs at the top that read "My Profile" and "Services" etc.
2. Click on "Services"
3. A series of links will appear. Click on "APOC Disclosure Forms"
4. You will then see tabs at the top and click on the one that says "Lobbying"
5. Once you click "Lobbying", let me know your username and I can then link it to the account

Once you have access to the account, you will go to "Employer of Lobbyist Reports" where you will see the previous reports that Donna filed. You will click the red button that says "Start New Form" where you will go through the pages and enter the appropriate information. On page two, you will change the "Report Year" from 2016 to 2015 and will be able to select "4th Quarter Report". I imagine that this will be a zero report, so all you really need to do is go through each page and click the "Zero Report" tabs as they come up.

On the final page, it will say "Incomplete". Scroll to the bottom of that page and click "Sign & Submit" where you will be prompted to enter your password. Once this is done, your form should be submitted.

I appreciate your cooperation in this matter.

Thank you,

Heather L. Dalberg

Paralegal I

Alaska Public Offices Commission

907.465.4864

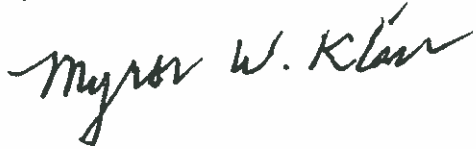
Fax: 907.465.4832

Heather L. Dalberg
Alaska Public Offices Commission
Heather.dalberg@alaska.gov

Heather,

Please provide proof that we are responsible for filing this report. We have no record authorizing any lobbying activity. Furthermore your reporting site does not work. Some of the tab buttons are non-responsive and if fact with some manipulation provide me with the computer code used to set the Form up. I have no interest in modifying or hacking the code to make the screen prompts work or to screw up your system more than it already is. See my comments on the following page. Please send a Form by fax that I can sign disavowing any on-going lobbying contract with Donna or any other purported lobbyist.

Myron W. Klein

A handwritten signature in black ink that reads "Myron W. Klein". The signature is written in a cursive, flowing style.

Subject: Account Set-Up

From: "Dalberg, Heather L (DOA)" <heather.dalberg@alaska.gov>

Date: 2/5/2016 10:58 AM

To: "Myron.klein@wsialaska.com" <Myron.klein@wsialaska.com>

Mr. Klein,

Thank you for getting in touch with me.

In order for me to give you access to Wright Service's Insight account, I will need you to set up a myAlaska account. You can do that at this [link](#).

If you already have a myAlaska account that you would like to use, go ahead and login and go through the following steps:

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5. Once you click "Lobbying", let me know your username and I can then link it to the account

Once you have access to the account, you will go to "Employer of Lobbyist Reports" where you will see the previous reports that Donna filed. You will click the red button that says "Start New Form" where you will go through the pages and enter the appropriate information. On page two, you will change the "Report Year" from 2016 to 2015 and will be able to select "4th Quarter Report" I imagine that this will be a zero report, so all you really need to do is go through each page and click the "Zero Report" tabs as they come up.

On the final page, it will say "Incomplete". Scroll to the bottom of that page and click "Sign & Submit" where you will be prompted to enter your password. Once this is done, your form should be submitted.

I appreciate your cooperation in this matter.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

Nothing was on the screen.

the "Reporting As" button does not work and the "Next" button does not work. No "Zero Report" tabs came up. Could not get to final page.

- Myron

From Dalberg, Heather L (DOA) **Date** Monday, February 08, 2016 8:55:00 AM
To Myron
Cc
Subject RE: Report pages are non-operative

Hi Myron,

The reason the filing did not work is because you missed the 5th step I provided. You need to let me know your username so I can link it to the Wright Services account. Without doing this, you are not filing for Wright Services. That is why you could not see Ms. Busig's lobbying activity. Please provide me with the username you were using and I will add you as a user on the existing account. Once you do this, you will be able to see the filings for 2015. Please call me if you have any more questions.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

-----Original Message-----

From: Myron [<mailto:myron.klein@wsialaska.com>]
Sent: Friday, February 05, 2016 5:20 PM
To: Dalberg, Heather L (DOA)
Subject: Report pages are non-operative

This E-mail was sent from "RNP0026737CF2CF" (MP C4503).

Scan Date: 02.05.2016 17:19:44 (-0900)
Queries to: scsalaska@wsialaska.com

From Dalberg, Heather L (DOA) **Date** Monday, February 08, 2016 9:19:00 AM
To Myron
Cc
Subject RE: Report pages are non-operative
[Wright Services - Donna Busig Lobbyist Registration 2015.pdf](#) (57 KB [HTML](#))

Myron,

Please find attached a copy of Donna Busig's lobbyist registration. She registered in February of 2015. According to her registration, she registered as a precaution and was not actually engaging in lobbying activity. Employees keep track of any lobbying activity and must register if they go over 10 hours in any 30 day period. She may have not wanted to count her hours and decided to register as a lobbyist with your company to avoid doing so. All of her previous reports and Wright Services' previous reports have been zero reports. This 4th quarter report will also be a zero report, most likely.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

-----Original Message-----

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To: Dalberg, Heather L (DOA)
Subject: Report pages are non-operative

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Scan Date: 02.05.2016 17:19:44 (-0900)
Queries to: scsalaska@wsialaska.com

LOBBYIST REGISTRATION FORM

COMPLETED

Lobbyist Signature Date: 02/11/2015
 Employer Signature Date: 02/11/2015
 Registration Year: 2015
 Lobbying Start Date: 02/11/2015

Filer First Name: Donna
 Filer Middle Name: Jean
 Filer Last Name: Busig

LOBBYIST INFORMATION

First Name: Donna
 Middle Name: Jean
 Last Name: Busig

Business Name:

Voter Registration District: 7D - Greater Wasilla

Permanent Mailing Address: 151 North Ashlee Circle
 City, State Zip: Wasilla, Alaska 99654
 Phone: 907-230-1692
 E-mail: donna.busig@wsialaska.com
 Fax:

Legislative Mailing Address: 151 North Ashlee Circle
 City, State Zip: Wasilla, Alaska 99654
 Phone: 907-230-1692
 E-mail: donna.busig@wsialaska.com
 Fax:

Spouse/Domestic Partner of Legislative Employee or Public Official?: No

EMPLOYEE / CLIENT INFORMATION

Employer: Wright Services Inc
 Contact Person First Name: Myron
 Contact Person Middle Name: Wright
 Contact Person Last Name: Klein
 Address: 5454 Shaune Drive
 City, State Zip: Juneau, Alaska 99801
 Phone: 906-780-5454
 E-mail: donna.busig@wrightservicesinc.com
 Fax: 907-780-5459

COMPENSATION

Will you perform other services in addition to lobbying for the employer or client named on this registration?
 Yes

General Manager of company

Will you engage in Administrative Lobbying on behalf of the client/employer?
 Yes

Will you engage in Legislative Lobbying on behalf of the client/employer?
 Yes

What is the nature of your compensation? Salaried Employee: Hourly Wage
 Amount: \$58.50

Will you be Reimbursed for Expenses?
Yes

Will you receive other compensation?
No

LOBBYING INTERESTS

Alaska landlord tenant laws

QUALIFICATION OR WAIVER

I have not yet engaged in lobbying activities for 10 hours in a 30-day period. I understand that I am not required to register as a lobbyist at this time but choose to do so. I understand that by registering as a lobbyist, I am prohibited from

Serving as a campaign manager or director; serving as a campaign treasurer or deputy treasurer; hosting a fundraising event; directly or indirectly collecting contributions for, or delivering contributions to, a candidate; or otherwise engaging in the fund-raising activities of a legislative or state-wide campaign for the remainder of this calendar year. AS 24.45.121(a)(8).

Making contributions to legislative candidates for one year after the date of this registration, except for legislative candidates running for the district in which I am eligible to vote. AS 15.13.074(g).

Violating the prohibitions listed in AS 24.45.121.

AFFIRMATION

Pursuant to AS 09.63.010, by signing this document I affirm, under penalty of perjury, that:

I have completed the appropriate training course administered by the Commission within the last 12 months [AS 24.45.041(b)];

I have not been previously convicted of a felony involving moral turpitude [AS 24.45.041(b)];

I am not prohibited from registering as a lobbyist by AS 24.45.121(c), (d), or (e);

Save as PDF

From Dalberg, Heather L (DOA) **Date** Wednesday, February 10, 2016 8:40:00 AM
To Myron
Cc
Subject RE: Report pages are non-operative

Thank you, Myron.

I was able to add your username to the existing Wright Services account. Now, if you follow the steps I sent you, you should be able to file this report and see the previous reports Donna filed.

When you file this report, please update the contact information to a mailing address where I can reach you. Let me know if you run into any trouble.

Thank you,
Heather L. Dalberg
Paralegal I
Alaska Public Offices Commission
907.465.4864
Fax: 907.465.4832

-----Original Message-----

From: Myron [<mailto:myron.klein@wsialaska.com>]

Sent: Tuesday, February 09, 2016 4:43 PM

To: Dalberg, Heather L (DOA)

Subject: Re: Report pages are non-operative

My username is [REDACTED] Myron

On 2/8/2016 8:56 AM, Dalberg, Heather L (DOA) wrote:

- > Hi Myron,
- > The reason the filing did not work is because you missed the 5th step I provided. You need to let me know your username so I can link it to the Wright Services account. Without doing this, you are not filing for Wright Services. That is why you could not see Ms. Busig's lobbying activity.
- > Please provide me with the username you were using and I will add you as a user on the existing account. Once you do this, you will be able to see the filings for 2015.
- > Please call me if you have any more questions.
- >

EMPLOYER OF LOBBYIST REPORT FORM

COMPLETED

Signed 02/10/2016
 Year: 2015
 Report: 4th Quarter

Filer First Name: MYRON
 Filer Middle Name: W
 Filer Last Name: KLEIN

EMPLOYER INFORMATION

Employer Name: Wright Services Inc

Mailing Address: 5454 Shaune Drive
 City, State Zip: Juneau, Alaska 99801
 Phone: 906-780-5454
 E-mail: myron.klein@wsialaska.com
 Fax: 907-780-5459

GIFTS

Date	Name	Position	Nature of Gift	Value
No Gifts Given				

NOTICE OF TERMINATION

Lobbyist Name	Termination Date
2015 - Busig, Donna	11/06/2015

INTERESTS OF EMPLOYER

General description of the legislative and administrative action the employer of lobbyist attempted to influence during the period. Report specific bill numbers when possible. AS 24.45.061(a)(5).

N/A

Nature and interest of the entity employing or retaining lobbying services:

N/A

SCHEDULE A (COMPENSATION AND EXPENSES PAID TO OR ON BEHALF OF THE LOBBYIST)

Lobbyist Name	Compensation		Expenses	
2015 - Busig, Donna	No Activity		No Activity	
	Totals		Totals	
	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$0.00	New Total	\$0.00

SCHEDULE B (COSTS RELATED TO LOBBYING)

In-House Costs Related to Lobbying

Employee Name	Lobbying Activity	Support of Lobbying	Amount
No In-House Lobbying Costs			

Outsourced Costs Related to Lobbying

Date	Payee/Vendor	Address	Purpose	Amount
No Outsourced Lobbying Costs				

Costs Related to Lobbying Totals

	This Report	\$0.00
	Previous Total	\$0.00
	New Total	\$0.00



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

April 29, 2016

Sandra Heffern
2100 Belmont Dr.
Anchorage, AK 99517
Sandraheffern@yahoo.com

Re: COMMISSION MEETING NOTICE

Ms. Heffern:

At its June 8, 2016 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Registration. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting in person or by telephone (1-800-315-6338, code 41761#), please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **10:05 a.m. on Wednesday, June 8, 2016**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

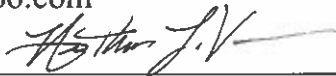
Respectfully,

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal I

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Sandra Heffern
2100 Belmont Dr.
Anchorage, AK 99517
Sandraheffern@yahoo.com



Paralegal I

4/29/16

Date



APOC STAFF RECOMMENDATION FOR COMMISSION ACTION

PREPARED BY: Heather Dalberg

DATE: April 29, 2016

RESPONDENT: Sandra Heffern

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.110

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Other: Lobbyist Registration

REASON FOR FILING: 2016 Lobbyist Registration

DUE DATE: 1/1/16

FILED ON: 3/9/16

DAYS LATE: 68

LATE NOTICE(S) SENT: 1

CPA APPEAL RECEIVED: 3/30/16

MAXIMUM STATUTORY CPA: \$680.00

RECOMMENDATION: Uphold assessed amount

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. The lobbyist, Sandra Heffern, registered with ResCare and paid the registration fee for \$250 on December 26, 2015 for lobbying services with a start date of January 1, 2016.
2. Ms. Heffern received an email confirming her electronic signature on the same date of the registration. She assumed everything was finished on her end.

3. She did not realize the registration was not complete until she went into the system on March 4, 2016 to amend a previous report. Ms. Heffern contacted APOC on March 7, 2016 to inform staff of the discrepancy.

4. Ms. Heffern corrected the registration error and accepts responsibility for the discrepancy. She relies on the APOC electronic filing system to notify her of updates and makes every effort to meet the reporting requirements and deadlines.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. On March 7, 2016 APOC staff was notified by Sandra Heffern of the delinquent registration with ResCare. In her email, Ms. Heffern stated that she noticed her 2016 registration was not completed on her employer's end. The employer of lobbyist, ResCare, was to finish the submission process by reviewing the registration and then signing it with their electronic signature. ResCare failed to do this and Ms. Heffern did not notice. She began lobbying without checking that the registration had been submitted.

2. Registering through the electronic filing system is a two step process. The lobbyist will fill out the registration, sign and submit the registration, and then an email is sent to the employer of lobbyist. The employer of lobbyist must then review the registration and sign and submit the registration. Both parties must sign and submit before the application is complete. When the lobbyist is waiting for the employer of lobbyist to sign and submit, the status of the registration will say "Waiting Employer Review". Once the employer of lobbyist signs and submits the registration, the status will change to "Submitted".

The email Ms. Heffern received from APOC is a generated email alerting her that her electronic signature was accepted. The email does not state that the process is complete or that her registration has been submitted.

3. On March 7, 2016 Ms. Heffern contacted APOC staff to communicate the confusion and told staff about the email she received that told her the process was complete. Staff recommended she appeal, though after reviewing the wording of the email, staff does not agree that the email indicated the registration was complete. The email states Ms. Heffern's electronic signature was successfully received, though nowhere did it state the registration had been successfully submitted.

4. APOC staff maintains that it is the responsibility of the lobbyist and their employer to confirm the registration is complete before engaging in lobbying activity. The electronic filing system does not generate an email if the registration's start date passes before the document is submitted.

FILER'S REPORTING HISTORY:

Affiant has been a filer since February of 2012. This is her first Civil Penalty.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the commission uphold the assessed amount of \$680.

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- ☐ Good filing history (no late filings in the previous 5 years) AND zero report. **2 AAC 50.865(a)(1)(A)**
- ☐ Inexperienced filer.¹ **2 AAC 50.865(a)(1)(B)**
- ☐ Technical error at APOC. **2 AAC 50.865(a)(2)**
- ☐ Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- ☐ Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- ☐ Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- ☐ APOC Staff error, including confirmed technical problems with electronic filing system. **2 AAC 50.865(b)(2)**
- ☐ Failure of a municipal clerk to provide notice to a municipal official of delinquency, or, failure of a municipal clerk to provide notice to a municipal official that a report does not meet the filing requirements under 2 AAC 50.850(f). **2 AAC 50.865(b)(3)**
- ☐ Report included only administrative costs (Groups only). **2 AAC 50.865(b)(4)**
- ☐ No significant harm to the public² AND no aggravating factors. **2 AAC 50.865(b)(5)**
- ☐ The maximum civil penalty assessment is significantly greater and out of proportion to the degree of harm to the public for not having the information. **2 AAC 50.865(b)(6)**
- ☐ A unique circumstance. **2 AAC 50.865(b)(7)**

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- ☐ Relying on another person or mailroom to mail, or submit the statement timely. **2 AAC 50.865(c)(1)**
- ☐ Forgetting to file. **2 AAC 50.865(c)(2)**
- ☐ Being a volunteer. **2 AAC 50.865(c)(3)**
- ☐ Having no change in data from previous statements on file. **2 AAC 50.865(c)(4)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **2 AAC 50.865(c)(5)**

¹ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

² The dollar amount missing is \$100 or less; the dollar amount missing is more than \$100 but less than \$1,000 and the filer self reported; or the missing information is readily available to the public through another forum.

- ☐ Being too busy to file. **2 AAC 50.865(c)(6)**
- ☐ Staff turnover, unless turnover created turmoil serious enough to justify a finding of unique circumstances. **2 AAC 50.865(c)(7)**
- ☐ Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. **2 AAC 50.865(c)(8)**

Aggravating Factors [2 AAC 50.865(d)]:

- ☐ Failure to comply with disclosure requirements by omitting a significant source of income, interest in real property, business interest, loan, trust, or other substantial financial interest.³ **2 AAC 50.865(d)(1)**
- ☐ More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- ☐ Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- ☐ Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- ☐ **Waived**
- ☐ **Reduced**
- ☒ **Upheld at the assessed amount of \$680**

³ Value greater than \$1000.



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Administration
ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 500
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 9, 2016

Sandra Heffern
2100 Belmont Drive
Anchorage, AK 99517

RE: 2016 Lobbyist Registration Audit

Dear Ms. Heffern:

The Alaska Public Offices Commission's mission is to encourage the public's confidence in their elected and appointed officials by administering Alaska's disclosure statutes and publishing financial information regarding the activities of election campaigns, public officials, lobbyists, and lobbyist employers.

AS 24.45.041(a) states that before engaging in lobbying, a lobbyist shall file a registration statement. According to our records, your 2016 Lobbyist registration for ResCare shows your lobbying start date as January 1, 2016. However, your registration was not submitted in Insight until March 9, 2016.

Failure to file a timely report results in the assessment of civil penalties for failure to comply with the provisions of the Lobbying Law under AS 24.45 and 2 AAC 50.550. By law, a penalty of \$10.00 per day accrues for every day the report is not filed. **Accordingly, the accrued penalty due this report is \$680.00.** This amount is equal to the sum of the number of days late (68) times the daily statutory penalty rate of \$10.00.

You may pay this penalty and avoid formal Commission action to order the penalty be paid by submitting payment by check to our Juneau office at the address listed above. Payment should be made within thirty (30) days of the date of this letter. If you cannot pay the entire balance at one time due to financial hardship, please call the Juneau office to discuss the details of a repayment agreement.

In the alternative, you have a right to appeal the assessment of this penalty. **If you wish to contest the assessment of penalty, you must submit the enclosed appeals affidavit to the Commission within thirty (30) days of the date of this letter. Discussions with Commission staff regarding a payment agreement do not toll the appeal period.** The APOC staff will review your affidavit and make a recommendation to the Commission regarding whether the penalty should be affirmed, reduced or waived. The staff will notify you of its recommendation before the Commission meeting at which your appeal is considered. Then, the Commission will

review your affidavit and consider your appeal during a Commission meeting at which you may participate in person or by phone. The Mitigation Criteria used by the Commission can be found on the APOC website at <http://doa.alaska.gov/apoc/>.

Further information on your right to appeal the assessment of penalty can be found in 2 AAC 50.550.

Failure to respond to this notice by making payment arrangements or by appealing the assessment will result in the staff presenting this matter to the Commission for entry of a final order assessing the penalty due.

Be aware that willful violation of the Alaska Lobbying law under AS 24.45 by a lobbyist can, upon conviction, be punished by a fine of not more than a \$1,000 or by imprisonment for not more than one year, or by both.

Should you have any questions, please contact this office at 907-465-4864. If you are calling long distance to Juneau from within the state, you may call toll-free at 866-465-4864.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION
907-465-4864

Enc.: Civil Penalty Appeal Affidavit

7010 2780 0000 7491 4134

U.S. Postal Service TM	
CERTIFIED MAIL TM RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Sent To <i>Sandra Heffern</i> <i>2016 RES CPA</i>	
Street, Apt. No., or PO Box No. <i>2100 Belmont Drive</i>	
City, State, ZIP+4 [®] <i>Anchorage, AK 99517</i>	
PS Form 3800, August 2006	
See Reverse for Instructions	

Civil Penalty Appeal Affidavit
AS 24.45 Alaska Lobbying Law

Name of Appellant
(Lobbyist or Employer):

Sandra Heffern

Employer (if a lobbyist):

ResCare

Penalty issued in connection with (check box or boxes):



Lobbyist Report for

Registration

(month or quarter)



Employer of Lobbyist Report for

(quarter)

Specify Year: 2016

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of AS 24.45, the Alaska Lobbying Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

see attached

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date:

Sandra J Heffern

Type/Print Signer's Name:

Sandra J Heffern

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

I paid the registration fee on December 26, 2015 for lobbying services for ResCare in 2016. On January 2nd, I completed both the 2015 4th quarter report and the registration for 2016. I received an email Electronic Signature Confirmation that same date and assumed everything from my end was taken care of. I did not realize the registration process had not been completed until I received a notice from APOC dated March 4, 2016 that my 2015 reported compensation was different than what my employer reported. When I went into the system, I corrected the error in Insight and notified the employer of record – ResCare that the error was on my end. At that time, I also notified my employer that my 2016 registration has not been completed in the system. We corrected this as soon as I was aware of the issue. Additionally, I notified APOC on March 7th of the situation.

While I accept responsibility for not ensuring that the registration form was actually certified, I rely on the APOC electronic notification system for updates. I made every effort to meet the reporting requirements and timelines. I apologize for the inconvenience and would appreciate consideration for a reduced penalty

Subject: RE: 2015 lobbyist report

Date: Monday, March 7, 2016 at 3:18:54 PM Alaska Standard Time

From: Dalberg, Heather L (DOA)

To: Sandra Heffern

Sandra,

Thank you for letting me know. I will make note of it.

Thank you,

Heather L. Dalberg

Paralegal I

Alaska Public Offices Commission

907.465.4864

Fax: 907.465.4832

From: Sandra Heffern [mailto:sandraheffern@yahoo.com]

Sent: Monday, March 07, 2016 3:08 PM

To: DOA APOC JNU

Subject: 2015 lobbyist report

I received a letter dated March 4, 2016 that stated there was a discrepancy in my compensation reported for 2015.

The discrepancy was my error. I have corrected the error in Insight and notified the employer of record – ResCare that the error was on my end. I also notified my employer that my 2016 registration has not been completed in the system. This should be rectified shortly. Please let me know if there's anything further that needs to be done. My apologies.

Regards,

Sandra Heffern

Effective Health Design

(907)529-6730

Confidentiality Notice: This email, including attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information.

Any unauthorized review, use, or disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender immediately and destroy all copies of the original.

Subject: myAlaska - Electronic Signature Confirmation

Date: Saturday, January 2, 2016 at 10:35:34 AM Alaska Standard Time

From: myAlaska

To: Sandraheffern@yahoo.com

This message was sent to you by a computer program, DO NOT REPLY to this message.

This email is being sent to notify you that your electronically signed document was successfully received.

Document Confirmation Code: 45027043DD41C9026F4279E18C0567F2

Title: Lobbyist Report

Department: Department of Administration

Division: Public Offices Commission

Certified Date: 1/2/2016 10:35 AM

Attachments: 0

This document is available from your myAlaska account under the myDocuments tab or by visiting the following URL:

<https://my.alaska.gov/ESignature/DocumentDetails.aspx?doc=45027043DD41C9026F4279E18C0567F2>

If you have not recently used myAlaska to electronically sign a document, this message may be evidence of unauthorized use of your myAlaska account, and you should consider contacting the myAlaska Help Center.

No unsolicited email will be sent to you from myAlaska, and myAlaska will not share your email address with other parties without your authorization.

The myAlaska Team

myAlaska Help Center Phone:

In Anchorage: 1-907-269-6311

In Fairbanks: 1-907-451-5911

In Juneau: 1-907-465-5211

Email: myalaska.help@alaska.gov

LOBBYIST REGISTRATION FORM

COMPLETED

Lobbyist Signature Date: **03/09/2016**
Employer Signature Date: **03/09/2016**
Registration Year: **2016**
Lobbying Start Date: **01/01/2016**

Filer First Name: **Sandra**
Filer Middle Name: **Jean**
Filer Last Name: **Heffern**

LOBBYIST INFORMATION

First Name: **Sandra**
Middle Name: **Jean**
Last Name: **Heffern**

Business Name: **EHD Enterprises**

Voter Registration District: **21K - West Anchorage**

Permanent Mailing Address: **2100 Belmont Dr**
City, State Zip: **Anchorage, Alaska 99517**
Phone: **243-6054 529-6730 529-6730**
E-mail: **Sandraheffern@yahoo.com**
Fax:

Legislative Mailing Address: **2100 Belmont Dr**
City, State Zip: **Anchorage, Alaska 99517**
Phone: **243-6054 529-6730 529-6730**
E-mail: **Sandraheffern@yahoo.com**
Fax:

Spouse/Domestic Partner of Legislative Employee or Public Official?: **No**

EMPLOYEE / CLIENT INFORMATION

Employer: **ResCare**
Contact Person First Name: **Ken**
Contact Person Middle Name:
Contact Person Last Name: **Lovan**
Address: **9901 Linn Station Rd**
City, State Zip: **Louisville, Kentucky 40223**
Phone: **(502)394-2335**
E-mail: **klovan@rescare.com**
Fax:

COMPENSATION

Will you perform other services in addition to lobbying for the employer or client named on this registration?
No

Will you engage in Administrative Lobbying on behalf of the client/employer?
Yes

Will you engage in Legislative Lobbying on behalf of the client/employer?
Yes

What is the nature of your compensation? **Contract Lobbyist: Monthly Fee**
Amount: **\$3,000.00**

Will you be Reimbursed for Expenses?
Yes

Will you receive other compensation?
No

LOBBYING INTERESTS

Issues related to health and human services

QUALIFICATION OR WAIVER

Does Not Apply

AFFIRMATION

Pursuant to AS 09.63.010, by signing this document I affirm, under penalty of perjury, that:

I have completed the appropriate training course administered by the Commission within the last 12 months [AS 24.45.041(b)];

I have not been previously convicted of a felony involving moral turpitude [AS 24.45.041(b)];

I am not prohibited from registering as a lobbyist by AS 24.45.121(c), (d), or (e);



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.daa.alaska.gov/apoc

April 29, 2016

Donna Busig
151 North Ashlee Circle
Wasilla, AK 99654

Re: COMMISSION MEETING NOTICE

Ms. Busig:

At its June 8, 2016 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Reports. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting in person or by telephone (1-800-315-6338, code 41761#), please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **10:05 a.m. on Wednesday, June 8, 2016**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

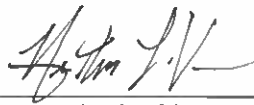
Respectfully,

A handwritten signature in black ink, appearing to read "Heather J. V." with a stylized flourish at the end.

Heather Dalberg
APOC Paralegal I

Certificate of Service I certified mailed a true and correct copy of the foregoing to:

Donna Busig
151 North Ashlee Circle
Wasilla, AK 99654



Paralegal I

4/29/16

Date



**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION
FINDINGS AND ORDER**

In the matter of civil penalty assessments against Donna Busig

On June 8, 2016, the Alaska Public Offices Commission (Commission) reviewed the civil penalties for Donna Busig's outstanding 2015 November Special Session Lobbyist Report and 4th Quarter Lobbyist Report. To date the filer has not submitted either report or paid the growing penalties and to facilitate collection proceedings by the Department of Law, the Commission issues the following Findings and Order.

Findings of Fact

1. Donna Busig was a registered lobbyist with Wright Services, Inc. from February through December of 2015 and subject to AS 24.45, Regulation of Lobbying Law.
2. Donna Busig reported timely from February through October of 2015. Ms. Busig left her job with Wright Services at some point in November. Her final two reports (November Special Session Lobbyist Report and 4th Quarter Lobbyist Report) have not been submitted and are currently accruing the \$10 per day civil penalty required by AS 24.45.141.
3. Donna Busig's November Special Session Lobbyist Report was due on December 31, 2015. Ms. Busig's 4th Quarter Lobbyist Report was due on February 1, 2016.
4. On January 4, 2016 APOC staff issued a Notice of Delinquency to Ms. Busig for the outstanding November Special Session Lobbyist Report. The notice provided the current penalty amount and notified Ms. Busig that the penalty would continue to accrue until the report was filed. The notice was sent to Ms. Busig's address on record by certified mail, return receipt. A second letter was sent on February 2, 2016 to notify Ms. Busig of the accrued penalty amount and of her requirement to file the report. The notice was sent to the filer's address on record by certified mail, return receipt. Both letters were signed for by an illegible signature that staff can only assume was from Ms. Busig. Attempts were made to call Ms. Busig preceding the late report's due date, though all the numbers on file are

disconnected. APOC staff called Ms. Busig's former employer, Wright Services, on December 31, 2015 but they did not have a forwarding number.

5. On February 2, 2016 APOC staff issued a Notice of Delinquency to Ms. Busig for the outstanding 4th Quarter Lobbyist Report. The notice provided the current penalty amount and notified Ms. Busig that the penalty would continue to accrue until the report was filed. The notice was sent to Ms. Busig's address on record by certified mail, return receipt. The letter was signed for by an illegible signature that staff can only assume was from Ms. Busig.
6. As of April 29, 2016 the filer has neither submitted the two delinquent reports nor paid the civil penalties of (as of 4/29/16) \$1,180.00 for the November Report and \$860.00 for the 4th Quarter Report.

Conclusions of Law

Due to Donna Busig's failure to file the 2015 November Special Session Lobbyist Report and 4th Quarter Lobbyist Report and failure to pay the penalties in a timely manner, the Commission upholds the penalty assessment under the provisions of AS 24.45.141 and 2 AAC 50.855.

Commission staff has exhausted efforts to collect the penalty due and owing to the State of Alaska under 2AAC 50.895, and approves referral of this case to the Office of the Attorney General to begin the formal collection process.

Decision and Order of the Commission

In accordance with the above findings of fact and conclusions of law, the Commission orders Donna Busig to pay a accruing civil penalties for failing to file the 2015 November Special Session and 4th Quarter Lobbyist Reports and refers this matter for collection to the Office of the Attorney General.

BY ORDER OF THE COMMISSION

NOTICE TO RESPONDENT

You must file 2015 November Special Session Lobbyist Report and 4th Quarter Lobbyist Report and pay the final penalties of each (final totals to be determined upon filing reports) to the State of Alaska within thirty days from the date of this order is distributed to you. To obtain judicial review of this order consistent with AS 44.62.560-570, you must file an appeal with the Superior Court within thirty days from the date this order is distributed to you.

Certificate of Service I certified mailed a true and correct copy of the foregoing to:

Donna Busig
151 North Ashlee Circle
Wasilla, AK 99654



Paralegal I

4/29/16

Date



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 500
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

2/2/16

Donna Busig
151 North Ashlee Circle
Wasilla, AK 99654

Dear Ms. Busig:

According to our records, you did not file your November Special Session Lobbying Report due on December 31, 2015. Failure to file a timely report results in the assessment of civil penalties for failure to comply with the provisions of the lobbying law under AS 24.45. By law, a penalty of \$10.00 per day accrues for every day the report is not filed. **As of the date of this letter, the report is 33 days late and the accrued penalty is \$330.**

Please submit the delinquent report along with your check for the accrued penalty. Your payment should include the entire accrued penalty due through the date of payment. As stated above, the \$10.00 per day penalty continues to accrue until you file the report. **To stop the accrual of penalties please file your report immediately.** If you have questions regarding what is the final total, please call our office.

In the alternative, you have a right to appeal the assessment of this penalty. **If you wish to contest the assessment of penalty, you must submit the enclosed appeals affidavit to the Commission within thirty (30) days of the date of this letter. Discussions with Commission staff regarding a payment agreement do not toll the appeal period.** The APOC staff will review your affidavit and if the penalty is less than \$100.00 staff may affirm, reduce, or waive the penalty. If the penalty is more than \$100.00 but less than \$250.00, APOC staff may reduce the penalty by 50 percent. For any penalty greater than \$250.00, APOC staff will review your affidavit and make a recommendation to the Commission regarding whether the penalty should be affirmed, reduced or waived. The staff will notify you of its recommendation before the Commission meeting at which your appeal is considered. The Commission will review your affidavit and consider your appeal during the Commission meeting, which you may participate in telephonically or in person. The Mitigation Criteria used by the Commission can be found on the APOC website at <http://doa.alaska.gov/apoc/>. Further information on your right to appeal the assessment of penalty can be found in 2 AAC 50.855; 2 AAC 50.860; and 2 AAC 50.865.

Failure to respond to this notice by making payment arrangements or by appealing the assessment will result in the staff presenting this matter to the Commission for entry of a final order assessing the penalty due.

Finally, should you have any questions or need assistance, please contact this office at 907-465-4864. If you are calling long distance to Juneau from within the state, you may call toll-free at 866-465-4864.

Sincerely,
ALASKA PUBLIC OFFICES COMMISSION

7010 2780 0000 7491 3922

CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To Donna Busig Nov. 2nd Delinquent Hr
 Street, Apt. No.,
 or PO Box No. 151 North Ashlee Circle
 City, State, ZIP+4 Wasilla, AK 99654

PS Form 3800, August 2005

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Donna Busig
 151 North Ashlee Circle
 Wasilla, AK 99654



9590 9403 0606 5183 5552 43

2. Article Number (Transfer from service label)

7010 2780 0000 7491 3922

PS Form 3811, April 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Address

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail[®]
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail

- ☐ Priority Mail Express[®]
- ☐ Registered MailTM
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

Domestic Return Receipt



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

1/4/16

Donna Busig
151 North Ashlee Circle
Wasilla, AK 99654

Dear Ms. Busig:

According to our records, you did not file your November Special Session Lobbying Report due on December 31, 2015. Failure to file a timely report results in the assessment of civil penalties for failure to comply with the provisions of the lobbying law under AS 24.45. By law, a penalty of \$10.00 per day accrues for every day the report is not filed. **As of the date of this letter, the report is 4 days late and the accrued penalty is \$40.**

Please submit the delinquent report along with your check for the accrued penalty. Your payment should include the entire accrued penalty due through the date of payment. As stated above, the \$10.00 per day penalty continues to accrue until you file the report. **To stop the accrual of penalties please file your report immediately.** If you have questions regarding what is the final total, please call our office.

In the alternative, you have a right to appeal the assessment of this penalty. **If you wish to contest the assessment of penalty, you must submit the enclosed appeals affidavit to the Commission within thirty (30) days of the date of this letter. Discussions with Commission staff regarding a payment agreement do not toll the appeal period.** The APOC staff will review your affidavit and if the penalty is less than \$100.00 staff may affirm, reduce, or waive the penalty. If the penalty is more than \$100.00 but less than \$250.00, APOC staff may reduce the penalty by 50 percent. For any penalty greater than \$250.00, APOC staff will review your affidavit and make a recommendation to the Commission regarding whether the penalty should be affirmed, reduced or waived. The staff will notify you of its recommendation before the Commission meeting at which your appeal is considered. The Commission will review your affidavit and consider your appeal during the Commission meeting, which you may participate in telephonically or in person. The Mitigation Criteria used by the Commission can be found on the APOC website at <http://doa.alaska.gov/apoc/>. Further information on your right to appeal the assessment of penalty can be found in 2 AAC 50.855; 2 AAC 50.860; and 2 AAC 50.865.

Failure to respond to this notice by making payment arrangements or by appealing the assessment will result in the staff presenting this matter to the Commission for entry of a final order assessing the penalty due.

Finally, should you have any questions or need assistance, please contact this office at 907-465-4864. If you are calling long distance to Juneau from within the state, you may call toll-free at 866-465-4864.

Sincerely,
ALASKA PUBLIC OFFICES COMMISSION


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Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To Donna Busig Delinquent Letter Nov.
 Street, Apt. No.,
 or PO Box No.
 City, State, ZIP+4

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery <u>1-2-16</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p><u>Donna Busig</u> <u>151 North Ashlee Circle</u> <u>Wasilla, AK 99654</u></p> <p> 9590 9403 0606 5183 5551 13</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express[®]</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered MailTM</p> <p><input checked="" type="checkbox"/> Certified Mail[®] <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature ConfirmationTM</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>
<p>2. Article Number (Transfer from service label)</p> <p><u>7010 2780 0000 7491 3809</u></p>	<p>all Restricted Delivery</p>

PS Form 3811, April 2015 PSN 7530-02-000-9053 Domestic Return Receipt



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 500
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

2/2/16

Donna Busig
151 North Ashlee Circle
Wasilla, AK 99654

Dear Ms. Busig:

According to our records, you did not file your 4th Quarter Lobbying Report due on February 1, 2016. Failure to file a timely report results in the assessment of civil penalties for failure to comply with the provisions of the lobbying law under AS 24.45. By law, a penalty of \$10.00 per day accrues for every day the report is not filed. **As of the date of this letter, the report is 1 day late and the accrued penalty is \$10.**

Please submit the delinquent report along with your check for the accrued penalty. Your payment should include the entire accrued penalty due through the date of payment. As stated above, the \$10.00 per day penalty continues to accrue until you file the report. **To stop the accrual of penalties please file your report immediately.** If you have questions regarding what is the final total, please call our office.

In the alternative, you have a right to appeal the assessment of this penalty. **If you wish to contest the assessment of penalty, you must submit the enclosed appeals affidavit to the Commission within thirty (30) days of the date of this letter. Discussions with Commission staff regarding a payment agreement do not toll the appeal period.** The APOC staff will review your affidavit and if the penalty is less than \$100.00 staff may affirm, reduce, or waive the penalty. If the penalty is more than \$100.00 but less than \$250.00, APOC staff may reduce the penalty by 50 percent. For any penalty greater than \$250.00, APOC staff will review your affidavit and make a recommendation to the Commission regarding whether the penalty should be affirmed, reduced or waived. The staff will notify you of its recommendation before the Commission meeting at which your appeal is considered. The Commission will review your affidavit and consider your appeal during the Commission meeting, which you may participate in telephonically or in person. The Mitigation Criteria used by the Commission can be found on the APOC website at <http://doa.alaska.gov/apoc/>. Further information on your right to appeal the assessment of penalty can be found in 2 AAC 50.855; 2 AAC 50.860; and 2 AAC 50.865.

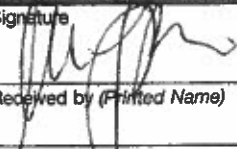
Failure to respond to this notice by making payment arrangements or by appealing the assessment will result in the staff presenting this matter to the Commission for entry of a final order assessing the penalty due.

Finally, should you have any questions or need assistance, please contact this office at 907-465-4864. If you are calling long distance to Juneau from within the state, you may call toll-free at 866-465-4864.

Sincerely,
ALASKA PUBLIC OFFICES COMMISSION

7010 2780 0000 7491 3915

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Street, Apt. No., or PO Box No. 151 North Ashlee Circle	
City, State, ZIP+4 Wasilla, AK 99654	
PS Form 3800, August 2005 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p>Donna Busig 151 North Ashlee Circle Wasilla, AK 99654</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express[®]</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered MailTM</p> <p><input checked="" type="checkbox"/> Certified Mail[®] <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>
<p>2. Article Number (Transfer from service label)</p> <p>7010 2780 0000 7491 3915</p>	<p><input type="checkbox"/> Restricted Delivery</p>

PS Form 3811, April 2015 PSN 7530-02-000-9053

Domestic Return Receipt